

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT COURT OF MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS,
INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE (HARVARD
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

MOTION TO INTERVENE IN DEFENSE OF HARVARD'S ADMISSIONS POLICY

Movants and Proposed Intervenors, M.B., K.C., Y.D., G.E., A.G., I.G., R.H., J.L., and R.S., nine minority students intending to apply for Harvard College, as well as Sarah Cole, Fadhal Moore, Arjini Kumari Nawal, Itzel Libertad Vasquez-Rodriguez, and Keyanna Wigglesworth, five minority Harvard College students (collectively, "Movants"), respectfully move to intervene in this case, pursuant to Fed. R. Civ. P. 24, in defense of Harvard's right to consider race or ethnicity in admissions. As detailed in the accompanying memorandum of reasons, Movants satisfy each of the requirements for intervention as of right under Fed. R. Civ. P. 24(a), but if the Court does not find that all of the Rule 24(a) elements have been met, Movants request in the alternative that they be allowed to intervene permissively under Fed. R. Civ. P. 24(b).

In addition to the memorandum, Movants have filed two additional supporting documents: (1) pursuant to Local Rule 7.1(b)(1), a declaration from each Proposed Intervenor

setting forth facts upon which this motion is based, *see* Ex. 1, and (2) pursuant to Fed. R. Civ. P. 24(c), a Proposed Answer.

WHEREFORE, Movants respectfully request that this Court grant this Motion to Intervene.

Dated: April 29, 2015

Respectfully submitted,

/s/ Rahsaan D. Hall
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ATTORNEYS FOR PROPOSED DEFENDANT
INTERVENORS

CERTIFICATE OF CONFERENCE

In accordance with Local Rule 7.1(a), I hereby certify that I conferred with counsel for Plaintiff and counsel for Defendant. Neither Plaintiff SFFA nor Defendant Harvard has decided its position on this motion and both wish to respond to it in accordance with the timeframe established by local rule.

/s/ Jon M. Greenbaum
Jon M. Greenbaum

CERTIFICATE OF SERVICE

In accordance with Local Rule 5.2(b), I hereby certify that this document filed through the ECF system on April 29, 2015 will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Rahsaan D. Hall
Rahsaan D. Hall